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DEPARTMENT OF TRANSPORTATION  
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DOCKET SECTION

REBUTTAL EXHIBITS  
OF  
TRANS WORLD AIRLINES

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

U.S. - TORONTO SERVICE PROCEEDING

DOCKET 50168



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## INTRODUCTION TO TWA'S REBUTTAL EXHIBITS

In Order 95-2-57 the Department established as decisional criteria the effect of the carriers' service proposals on the overall market structure, the level of competition both between U.S. and Canadian flag carriers and among U.S. flag carriers, and which carriers will be most likely to offer and maintain service that provides maximum public benefits.

The evidence in this proceeding demonstrates that TWA should be selected as one of the two carriers for Year 1 authority, to immediately replace USAir. Of the five applicants, TWA is the only carrier with no authority to serve Canada. St. Louis is the most poorly served gateway city (Exhibit TW-R-106). TWA's St. Louis - Toronto service will benefit far more local O&D passengers than USAir, Northwest or Continental (TW-R-104). TWA's single plane service will provide more public benefits than that of any other applicant (TW-R-106).<sup>1</sup> Further, TWA's St. Louis hub is just as effective as USAir's Pittsburgh hub and Northwest's Minneapolis/St. Paul hub in generating new online service for Toronto passengers (TW-R-105).

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<sup>1</sup>Exhibit TW-R-106 compares O&D passengers (PCIR2A) with onflight O&D passengers (PCIR1D). Because onflight O&D passengers include some from different O&D markets, it is not a precise measure of how many O&D passengers used other than single plane service. However, it is a reasonable indicator.



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Developments since Delta and USAir were granted exemption authority reinforce the conclusion that selection of TWA for certificate authority more closely meets the Department's criteria. Air Canada has announced inauguration of service between Toronto and Washington National Airport effective June 19. Assuming USAir's is granted an exemption to match, that would give USAir two of the four allowable Toronto frequencies during the first two years, a result clearly inconsistent with the Department's market structure objectives.<sup>2</sup> Contrary to USAir expectations, Delta has maintained three round trips between Pittsburgh and Toronto, and USAir's service provides no benefits to that market. Finally, the addition of Washington National as still another USAir gateway further diminishes Pittsburgh's role as a meaningful USAir gateway.

In fact, as demonstrated in Exhibit TW-R-107, replacement of USAir by TWA would have virtually no effect on USAir passengers. Of USAir's forecast 151,000 forecast online passengers, only 1,500--two passengers per day each way--would not have access to alternative expedited service. Ninety-nine percent of their passengers would have nonstop service by USAir and other carriers, service via other USAir hubs, TWA service to St. Louis and points west, and/or service via other carriers' hubs.

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<sup>2</sup>The additional frequencies authorized in Year 3 can be awarded on routes authorized in Years 1 and 2



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Similarly, the loss of Pittsburgh - Toronto authority would have only marginal impact on USAir. It can retain most of its traffic via other gateways. It will retain its position as the second largest U.S. carrier in Toronto (TW-R-201 and TW-R-202), and cancellation of two of its 20 Toronto departures will be offset by the addition of two departures to Washington National Airport.

#### **Rebuttal to USAir**

It is beyond dispute that USAir has extensive Toronto authority and has the second largest Toronto operation of any U.S. carrier. USAir even features that fact in its direct exhibits (US-104 and US-105). In that context allocation to USAir of two of the four Toronto routes available during the first two years of the new bilateral agreement would not enhance competition. To the contrary, it would frustrate new competitive entry and to increase industry concentration.

It also should be beyond dispute that an award to USAir is not justified by the need of the Pittsburgh market for additional service or by the service benefits USAir would provide. Delta provides three well timed round trips, and three of USAir's four daily flights virtually duplicate Delta's departure times. The fourth is a late night departure. USAir itself forecasts that it will carry only 21 Pittsburgh passengers per day each way (TW-R-104), and in actuality its traffic probably will be lower because it has overstated its market share (TW-R-204). USAir apparently



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assumed Delta would reduce its service to two daily round trips instead of the three it actually is operating.

The only possible justification then for an award to USAir is the value of the Pittsburgh hub to thru and connecting passengers. The evidence shows a wide gap between the perceived value of that hub and reality. Service via the Pittsburgh hub largely duplicates USAir service via other hubs; connections to its claimed catchment area are to a large extent inadequate and inconvenient; and there are a large number of cities west of the Mississippi, which can be served with nonstop-to-nonstop connections via a midcontinent hub such as St. Louis, but which are not served via Pittsburgh.

USAir claims 95 cities with 3.5 million Toronto passengers for its Pittsburgh catchment area (US-106). What it neglects to state is that those cities include New York, Chicago and 24 other cities, comprising 2.7 million of the 3.5 million passengers, which have nonstop service to Chicago. USAir further neglects to acknowledge that nearly half of that catchment area, 44 cities, with more than 1.6 million passengers, already have USAir Toronto service via another of its gateways. The real net new catchment area consists of 40 cities with less than one half million passengers. (TW-R-205).



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Similarly, the vast majority (73 percent) of the passengers USAir is forecasting for its service come from cities which already have alternative USAir service and/or nonstop service on another carrier. (TW-R-208)..

Moreover, to claim that 94 cities receive Toronto service via Pittsburgh, USAir has employed a liberal interpretation of service. Like TWA at St. Louis, USAir operates separate eastbound and westbound connecting banks at Pittsburgh, with Toronto classified for scheduling purposes as east of Pittsburgh.. Unlike TWA, which shows only connections in the same bank (TW-152), USAir claims connections with flights operating in different connecting banks than the Toronto flights. In fact, 36 percent of USAir's claimed connections are in different banks (TW-R-209.) Fully one-third of all USAir connections have connecting times of over 1:45.

Excluding these extremely long connections, 21 cities in USAir's claimed catchment area have no nonstop-to-nonstop connections via Pittsburgh to or from Toronto. Another 19 have connections in one direction only. Thus, nearly half of the 94 cities do not have even one round trip connection. Less than one quarter connect with all four Toronto flights. (TW-R-211).

Conversely, more than 90 percent of the cities TWA will serve via St. Louis will have at least one round trip connection to Toronto. Nearly two-thirds will have two round trips. In fact, TWA will offer two-round-trip connecting service to 11 more cities than USAir, 32 vs 21. (TW-R-212)



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Moreover, despite the western orientation of the USAir connecting banks through which Toronto is scheduled, Pittsburgh is an ineffective hub for serving the West. TWA will provide jet service--nonstop, single plane or nonstop-to-nonstop connections--to 32 cities west of the Mississippi. USAir serves only 12 from Pittsburgh. (TW-R-213).

Thus, to the East, USAir's Toronto service is relatively inconvenient and largely duplicates its service via other hubs. To the West, it cannot provide nearly the service that TWA will provide via St. Louis. The inescapable conclusion is that the limited Toronto authority available to U.S. flag carriers would be better utilized at TWA's St. Louis hub.

### **Rebuttal to Continental**

Continental in its direct exhibits has made no showing of public benefit in support of its New York - Toronto application. It would add two round trips to the 14 of Air Canada, its part owner and code sharing partner (TW-R-301). It would place its code on Air Canada's flights serving both Newark and LaGuardia to enhance Air Canada's competitive position. It would provide single plane service to two Florida cities which already have ample service by both scheduled and nonscheduled carriers. (See TW-R-106). Nearly two-thirds of the thru/connecting passengers it claims it will carry via Newark are in markets which already have nonstop service to Toronto (TW-R-304) and which in any event can receive the same service under the Air Canada code. Furthermore, with a vastly overstated traffic forecast, Continental exaggerates its commercial benefit. (TW-R-303).



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### **Rebuttal to Northwest**

Northwest is adding to its fleet of DC9s with 16 aircraft formerly operated by Eastern and would use one of those for its Minneapolis/St. Paul - Toronto service. (NW-204). While the MSP-YYZ route may comprise efficient use of a DC9, a 100 seat DC-9 is not efficient us of limited Toronto frequencies. It would not provide sufficient capacity for the local market or to accommodate demand during seasonal peaks; and it would not permit Northwest to provide meaningful single plane service beyond the gateway.

Northwest has not taken advantage of its one-stop authority via Detroit to address the needs of the local MSP - Toronto market (TW-R-401), and two DC9 round trips would do little to remedy that situation. Only 30 percent of local market passengers would be accommodated on Northwest's nonstop service (TW-R-402). Ordinarily, two well-timed nonstop round trips competing against sporadic single plane service should obtain most of the traffic in the market, but Northwest simply would not provide the capacity needed to carry the traffic.

Northwest, like TWA, if forecasting a distinct summer peak in traffic, based on experience at Detroit and Chicago. Unlike TWA, however, Northwest would not accommodate the summer demand. For three solid months, August through September, it is forecasting load factors averaging over 84 percent--virtually at maximum practical capacity when normal day-to-day fluctuations and passenger no-shows are considered. (TW-R-404)



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Use of a DC9 also is the apparent reason for Northwest's failure to propose meaningful single plane service. The Toronto - Boise market, a proposed Northwest one-stop market, generated 2.6 passengers per day each way in 1993 and ranked 108th among U.S. - Toronto markets.

To offset the lack of public benefits in either the local O&D market or in one-stop service, Northwest has invented a new criterion, "noncircuitous service" and has defined that as within five percent of nonstop mileage. In alleging these benefits for its MSP hub, Northwest has overlooked the fact that it already has a hub--Detroit--which provides noncircuitous service to the West (TW-R-405). In fact, Nearly half of Northwest's forecast thru and connecting passengers via Minneapolis/St. Paul are in markets which have expedited service via Detroit. (TW-R-406). Moreover, nearly half of the cities Northwest would serve generate less than 1,000 passengers a year. Thus, the value of the MSP is a fraction of what Northwest claims.

A comparison of the TWA and Northwest proposals clearly demonstrates the superiority of TWA's St. Louis service. TWA would carry more than twice as many local O&D passengers (TW-R-408). TWA would carry four times as many one-stop passengers (TW-R-409). TWA would offer more jet connections and more total connections at St. Louis than Northwest at MSP (TW-R-410). Excluding cities that both TWA and Northwest would serve, TWA's St. Louis catchment area, as measured by total O&D passengers, is more than twice the size of Northwest's Minneapolis/St. Paul catchment area (TW-R-411). Finally, based on Northwest's



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own criteria, TWA's service via St. Louis would convenience nearly five times as many passengers in top markets west of the Mississippi as Northwest's proposal (TW-R-112).

### **Rebuttal to Delta**

Delta's claimed public benefits largely are based on the size of the Atlanta - Toronto market and the absence of nonstop service, the size of the market between Toronto and the Southeastern United States and Delta's ability to serve that area through its Atlanta hub. TWA does not dispute those claims nor the fact that for Atlanta O&D passengers and those transiting the Atlanta hub, the ability to overfly Pittsburgh is a significant convenience. However, the benefits of TWA's service to St. Louis and its catchment area are equally as important.

Contrary to Delta's exhibits, Atlanta will have nonstop service to Toronto, with or without Delta. Air Canada offers four daily round trips (TW-R-505). That leaves St. Louis and Minneapolis/St. Paul as the largest hubs without nonstop service to Toronto.

Delta claims an Atlanta catchment area of over 860,000 passengers (DL-115). TWA's St. Louis catchment area consists of over one million O&D passengers, and excluding cities with nonstop service to Toronto, the St. Louis catchment area is two and one half times Atlanta's.



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Finally, an award to Delta would not obviate the need for Toronto service through TWA's midcontinent St. Louis hub. Atlanta and St. Louis essentially serve different catchment areas. Because TWA will serve Toronto through connecting banks designed to serve the West, it does not claim significant participation in the traffic between Toronto and points east of the Mississippi. Conversely, Delta cannot match TWA's service to the West. TWA will provide Toronto jet service to 32 cities west of the Mississippi; Delta will serve only 12 (TW-R-502), and that service is too circuitous as to be convenient (TW-R-501).



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**TWA'S ST. LOUIS - TORONTO SERVICE  
WILL PROVIDE NEW SINGLE CARRIER BENEFITS TO  
MARKETS WITH MORE THAN ONE MILLION PASSENGERS  
HALF OF WHOM HAVE NO NONSTOP SERVICE TO TORONTO  
(Rebuttal to Exhibits CO-100, DL-T-1, NW-100, US-106)**

	<b>Total Market 12 Months Ended June 30, 1994 (1)</b>	<b>Markets With Nonstop Service (2)</b>	<b>Other Markets</b>
St. Louis Nonstop	28,570	0	28,570
TWA One-Stop Markets	91,410	0	91,410
Online Jet Connecting Markets	931,480	549,790	377,390
Trans World Express Connecting Markets	27,690	0	27,690
Online Total	1,079,150	549,790	525,060

See pp 2 and 3 for detail and footnotes



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**TWA'S ST. LOUIS - TORONTO SERVICE  
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MARKETS WITH MORE THAN ONE MILLION PASSENGERS  
HALF OF WHOM HAVE NO NONSTOP SERVICE TO TORONTO  
(Rebuttal to Exhibits CO-100, DL-T-1, NW-100, US-106)**

	<b>Total Passengers 12 Months Ended June, 1994 (1)</b>	<b>Markets With Nonstop Service (2)</b>	<b>Other Markets</b>
<b>TWA Nonstop Market</b>			
St. Louis	28,570		28,570
<b>TWA One-Stop Markets</b>			
Phoenix	56,890		56,890
San Diego	34,520		34,520
<b>Total</b>	<b>91,410</b>		<b>91,410</b>
<b>Online Jet Connecting Markets</b>			
Albuquerque	8,390		8,390
Austin	11,130		11,130
Cedar Rapids	4,360		4,360
Colorado Springs	4,280		4,280
Dallas/Ft. Worth	108,920	108,920	0
Denver	41,960		41,960
Des Moines	5,610		5,610
Honolulu	18,730		18,730
Houston	22,530	22,530	0
Kansas City	21,180		21,180
Las Vegas	32,500		32,500
Lincoln	2,360		2,360
Little Rock	4,060		4,060
Los Angeles	242,650	242,650	0
Louisville	7,230		7,230
Moline	3,480		3,480
Nashville (3)	45,340		45,340
New Orleans	30,250		30,250
Oklahoma City	4,390		4,390
Omaha	5,510		5,510
Ontario	9,580		9,580
Orange County	13,300		13,300
Portland	13,560		13,560
Sacramento	7,690		7,690
Salt Lake City	17,540		17,540
San Antonio	12,080		12,080
San Francisco	175,690	175,690	0
San Jose	13,840		13,840
Seattle	29,480		29,480
Shreveport	1,640		1,640
Sioux Falls	1,300		1,300
Springfield, MO	1,170		1,170
Tulsa	5,450		5,450
<b>Total</b>	<b>931,480</b>	<b>549,790</b>	<b>377,390</b>



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**TWA'S ST. LOUIS - TORONTO SERVICE  
WILL PROVIDE NEW SINGLE CARRIER BENEFITS TO  
MARKETS WITH MORE THAN ONE MILLION PASSENGERS  
HALF OF WHOM HAVE NO NONSTOP SERVICE TO TORONTO  
(Rebuttal to Exhibits CO-100, DL-T-1, NW-100, US-106)**

	<b>Total Market 12 Months Ended June 30, 1994 (1)</b>	<b>Markets With Nonstop Service (2)</b>	<b>Other Markets</b>
<b>Trans World Express Connecting Markets</b>			
Birmingham	4,510		4,510
Burlington	570		570
Champagne	1,160		1,160
Columbia	120		120
Decatur	350		350
Evansville	1,900		1,900
Fayetteville	3,010		3,010
Joplin	350		350
Marion	0		0
Memphis	11,470		11,470
Paducah	310		310
Peoria	1,660		1,660
Quincy	170		170
Sioux City	760		760
Springfield, IL	570		570
Waterloo	780		780
<b>Total</b>	<b>27,690</b>		<b>27,690</b>

(1) Source: TW-301

(2) Source: Official Airline Guide

(3) American is discontinuing nonstop service June 15



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**TWA'S ST. LOUIS - TORONTO SERVICE  
WILL PROVIDE NEW SINGLE CARRIER BENEFITS TO  
MORE THAN 105,000 PASSENGERS,  
93,000 OF WHOM HAVE NO NONSTOP SERVICE TO TORONTO  
(Rebuttal to CO-301, DL-301, NW-301, US-301)**

	O&D Passengers 12 Months Ended March 31, 1996 (1)	Markets With Nonstop Service (2)	Other Markets
<b>TWA Nonstop Market</b>			
St. Louis	46,230		46,230
<b>TWA One-Stop Market</b>			
Phoenix	6,137		6,137
San Diego	11,172		11,172
<b>Total</b>	<b>17,309</b>		<b>17,309</b>
<b>Online Jet Connecting Market</b>			
Albuquerque	1,358		1,358
Austin	600		600
Cedar Rapids	470		470
Colorado Springs	231		231
Dallas/Ft. Worth	2,350	2,350	0
Denver	4,526		4,526
Des Moines	303		303
Honolulu	404		404
Houston	486	486	0
Kansas City	1,142		1,142
Las Vegas	701		701
Lincoln	51		51
Little Rock	438		438
Los Angeles	5,235	5,235	0
Louisville	390		390
Moline	563		563
Nashville (3)	978		978
New Orleans	1,632		1,632
Oklahoma City	474		474
Omaha	297		297
Ontario	413		413
Orange County	717		717
Portland	731		731
Sacramento	415		415
Salt Lake City	946		946
San Antonio	1,303		1,303
San Francisco	3,791	3,791	0
San Jose	746		746
Seattle	636		636
Shreveport	35		35
Sioux Falls	210		210
Springfield, MO	189		189
Tulsa	294		294
Wichita	464		464
<b>Total</b>	<b>33,522</b>	<b>11,862</b>	<b>21,660</b>
<b>TWE Connecting Markets</b>	<b>3,210</b>	<b>0</b>	<b>3,210</b>
<b>Online Total</b>	<b>100,270</b>	<b>11,862</b>	<b>88,409</b>
<b>Interline Connections</b>	<b>4,900</b>	<b>0</b>	<b>4,900</b>
<b>Total On Board</b>	<b>105,170</b>	<b>11,862</b>	<b>93,309</b>

(1) Source: TW-301

(2) Source: Official Airline Guide

(3) American is discontinuing nonstop service June 15



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**TWA'S ST. LOUIS - TORONTO SERVICE  
WILL BENEFIT MORE PASSENGERS THAN  
USAIR, NORTHWEST OR CONTINENTAL**

**Forecast O&D Passengers  
12 Months Ended March 1996**

	Local O&D (1)	Thru/ Connect (2)	Total
<b>TWA</b>			
St. Louis	46,230	42,178	88,408
<b>Northwest</b>			
Minneapolis/St. Paul	18,096	46,556	64,652
<b>USAir</b>			
Pittsburgh	15,590	41,207	56,797
<b>Continental</b>			
Newark	35,511	17,680	53,191

(1) See Exhibit TW-R-104

(2) Excluding markets with nonstop service and those  
already served by the applicant via other hubs.  
See TW-R-105



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**TWA'S ST. LOUIS - TORONTO SERVICE  
WILL BENEFIT MORE LOCAL PASSENGERS  
THAN CONTINENTAL, NORTHWEST OR USAIR**

O&D Passengers  
12 Months Ended  
March 1996

**TWA**

St. Louis (1)	46,230
---------------	--------

**Continental**

Newark (2)	35,511
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**Northwest**

Minneapolis/St. Paul (3)	18,096
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**USAir**

Pittsburgh (4)	15,590
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(1) From TW-301

(2) See TW-R-303

(3) From NW-301

(4) From US-301. USAir forecast is overstated.  
See TW-R-204



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**THERE IS LITTLE DIFFERENCE IN BENEFITS TO  
THROUGH/CONNECTING PASSENGERS AMONG  
TWA, NORTHWEST AND USAIR**

**Forecast O&D Passengers  
12 Months Ended March 1996**

	Online Market Total	Served Via Other Hubs	Net	Existing Nonstop Service	Net Benefit
TWA	54,040	0	54,040	11,862 (1)	42,178
Northwest	86,735	40,179 (2)	46,556	0	46,556
USAir	136,364	76,359 (3)	60,005	18,798 (3)	41,207
Continental	51,724	0	51,724	34,044 (4)	17,680

(1) From TW-R-102

(2) From TW-R-407

(3) From TW-R-206

(4) From TW-R-304



**TWA'S PROPOSED SINGLE PLANE MARKETS  
ARE THE MOST UNDERSERVED TORONTO  
MARKETS AT ISSUE IN THIS PROCEEDING**

Carrier	Market	O&D Psgs Year 1993	On-Flight O&D Psgs Year 1993	Difference
TWA	Phoenix (1)	49,030	12,620	36,410
TWA	San Diego (1)	32,030	2,629	29,401
TWA	St. Louis	28,520	610	27,910
USAir	Seattle (2)	29,360	6,148	23,212
Northwest	Salt Lake City	16,790	225	16,565
Northwest	Minneapolis/St. Paul	51,290	42,824	8,466
Northwest	Boise	1,890	0	1,890
USAir	Pittsburgh	32,180	54,275	(22,095)
Delta	Atlanta	90,110	151,982	(61,872)
Continental	Newark/New York	741,670	854,530	(112,860)
Continental	Ft. Lauderdale	40,740	155,991	(115,251)
USAir	Orlando (2)	74,340	267,300	(192,960)
Continental	Orlando	74,340	267,300	(192,960)

- (1) USAir proposes seasonal service
- (2) Seasonal service

Note: On-flight O&D data include nonscheduled service

Sources: PCIR1D, PCIR2A



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**REPLACEMENT OF USAIR'S PITTSBURGH - TORONTO  
SERVICE BY TWA'S ST. LOUIS - TORONTO SERVICE  
WOULD BENEFIT 46,000 ST. LOUIS PASSENGERS  
WITH NEGLIGIBLE IMPACT ON USAIR PASSENGERS**

	O&D Passengers 12 Months Ended March 1996
TWA	
St. Louis - Toronto	46,230
USAir	
Total Online Passengers	151,923
Markets without Alternative Service	
Jet	742
Express	769
Total	1,511
% of Total Passengers	1.0%

Sources: Exhibit TW-301  
Pp 2 - 5 of this exhibit



REPLACEMENT OF USAIR'S PITTSBURGH - TORONTO  
SERVICE BY TWA'S ST. LOUIS - TORONTO SERVICE  
WOULD BENEFIT 46,000 ST. LOUIS PASSENGERS  
WITH NEGLIGIBLE IMPACT ON USAIR PASSENGERS

Forecast USAir O&D Passengers, 12 Months Ended March 1996

	Total	USAir Nonstop Service (1)	Other Nonstop Service (1)	Served via Another USAir Hub (1)	TWA Will Serve (2)	Served by Other Carriers (3)	Unserved
Akron	386						386
Albany	134		134	134			
Albuquerque	988				988		
Allentown	914			914			
Altoona	124						124
Ashland	225						225
Atlanta	934		934	934			
Austin	867				867		
Baltimore	1,032	1,032		1,032			
Binghamton	69						69
Birmingham	578			578			
Boston	1,703	1,703		1,703			
Burlington	394			394			
Charlottesville	432			432			
Charlotte	3,208			3,208			
Chicago	1,656		1,656				
Cincinnati	456		456				
Clarksburg	274						
Cleveland	2,969	2,969		2,969			
Columbus	1,930			1,930			
Cumberland	155						
Dallas/Ft. Worth	2,074		2,074		2,074		
Dayton	501	501		501			
Denver	2,867				2,867		
Detroit	987		987				
Elmira	31						31
Evansville	564			564			
Flint	1,282		1,282				
Ft. Lauderdale	3,309		3,309	3,309			
Ft. Myers	1,817			1,817			
Ft. Wayne	833					833	
Greenbrier	60						60
Greensboro	878			878			
Hagerstown	225			225			
Harrisburg	1,557			1,557			
Hartford	2,188		2,188	2,188			
Houston	566		566		566		
Indianapolis	1,584	1,584		1,584			



REPLACEMENT OF USAIR'S PITTSBURGH - TORONTO  
SERVICE BY TWA'S ST. LOUIS - TORONTO SERVICE  
WOULD BENEFIT 46,000 ST. LOUIS PASSENGERS  
WITH NEGLIGIBLE IMPACT ON USAIR PASSENGERS

Forecast USAir O&D Passengers, 12 Months Ended March 1996

	Total	USAir Nonstop Service (1)	Other Nonstop Service (1)	Served via Another USAir Hub (1)	TWA Will Serve (2)	Served by Other Carriers (3)	Unserved
Islip	285			285			
Jacksonville	980			980			
Johnstown	52						52 *
Kalamazoo	838					838	
Kansas City	2,119				2,119		
Knoxville	723						
Lancaster	165			165			
Lansing	406					406	
Las Vegas	1,656				1,656		
Lexington	788						
Los Angeles	4,060		4,060		4,060		
Louisville	1,735					1,735	
Manchester	658			658			
Memphis	776				776		
Miami	2,706		2,706	2,706			
Milwaukee	3,206		3,206				
Minneapolis	4,106					4,106	
Morgantown	148						148 *
Nashville	1,606		1,606				
New Orleans	3,000			3,000	3,000		
New York	4,844		4,844	4,844			
Newburgh	246			246			
Newport News	252			252			
Norfolk	526			526			
Oil City	31						31
Orlando	8,156		8,156	8,156			
Parkersburg	238						238 *
Philadelphia	2,635	2,635		2,635			
Phoenix	5,296				5,296		
Pittsburgh	15,559		15,559				
Portland, ME	868			868			
Providence	257			257			
Raleigh/Durham	2,036			2,036			
Reading	173			173			
Richmond	859			859			
Roanoke	528					528	
Saginaw	309					309	
San Antonio	432				432		



REPLACEMENT OF USAIR'S PITTSBURGH - TORONTO  
SERVICE BY TWA'S ST. LOUIS - TORONTO SERVICE  
WOULD BENEFIT 46,000 ST. LOUIS PASSENGERS  
WITH NEGLIGIBLE IMPACT ON USAIR PASSENGERS

Forecast USAir O&D Passengers, 12 Months Ended March 1996

	Total	USAir Nonstop Service (1)	Other Nonstop Service (1)	Served via Another USAir Hub (1)	TWA Will Serve (2)	Served by Other Carriers (3)	Unserved
San Diego	4,675				4,675		
San Francisco	2,021		2,021		2,021		
San Juan	1,468			1,468			
Santa Ana	1,414				1,414		
Sarasota	1,219			1,219			
Scranton	670			670			
Seattle	3,374				3,374		
South Bend	1,155					1,155	
State College	147						147 •
St. Louis	3,112				3,112		
Tampa	12,878		12,878	12,878			
Toledo	333					333	
Washington	1,073	1,073		1,073			
West Palm Beach	3,120			3,120			
White Plains	154			154			
Williamsport	280			280			
Youngstown	121					121	
Total Online	151,923	11,497	68,622	76,359	39,297	10,364	1,511
Jet Markets							742

• Served by USAir Express. See US-204

(1) Source: TW-R-108

(2) Source: TW-151, TW-152

(3) See page 5



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**REPLACEMENT OF USAIR'S PITTSBURGH - TORONTO  
SERVICE BY TWA'S ST. LOUIS - TORONTO SERVICE  
WOULD BENEFIT 46,000 ST. LOUIS PASSENGERS  
WITH NEGLIGIBLE IMPACT ON USAIR PASSENGERS**

**Existing Service by Other Carriers**

Ft. Wayne	AA, DL, NW, UA
Kalamazoo	AA, DL, NW, UA
Lansing	DL, NW
Louisville	AA, DL, NW
Minneapolis/St. Paul	AA, DL, NW, UA
Roanoke	DL, NW
Saginaw	DL, NW, UA
South Bend	AA, DL, NW, UA
Toledo	NW
Youngstown	NW

Note: Markets shown are those without nonstop service,  
service via another USAir hub or proposed TWA service

Source: Official Airline Guide



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Exhibit TW-R-201  
Page 1 of 1

USAIR RANKS SECOND IN TOTAL O&D TRAFFIC AT TORONTO  
YEAR ENDING 2nd QUARTER 1994

RANK	CARRIER	TOTAL TRAFFIC	ENPLANEMENT/ DAY
1	AA	1,092,977	1,497
2	US	514,404	705
3	DL	416,206	570
4	UA	370,426	507
5	NW	359,034	492

Source: Exhibit US-104



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Exhibit TW-R-202  
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USAIR RANKS SECOND AMONG MAJOR US CARRIERS SERVING TORONTO  
BASED ON DEPARTURES

RANK	CARRIER	JET DEPARTURES (PER DAY)	EXPRESS DEPARTURES (PER DAY)	TOTAL DEPARTURES
1	DELTA	6	17	23
2	USAIR	12	8	20
3	AMERICAN	18	0	18
4	UNITED	6	0	6
5	NORTHWEST	5	0	5

Note: December 1994 departures

Source: Exhibit US-105



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Exhibit TW-R-203  
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**USAIR'S PITTSBURGH - TORONTO SERVICE  
PROVIDES NO SERVICE BENEFITS  
FOR THE LOCAL MARKET PASSENGERS  
(Rebuttal to Exhibit US-200)**

Dep YYZ		Dep PIT	
Delta	USAir	Delta	USAir
0730	0730	1210	
1415		1555	1600
1810	1815	1940	
			2115

Source: Exhibit US-201, Official Airline Guide



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**USAIR'S FORECAST OVERSTATES  
ITS PITTSBURGH - TORONTO  
MARKET SHARE  
(Rebuttal to Exhibit US-301)**

USAir Forecast Market Share      48.4%

Daily Round Trips (1)

USAir	2
Delta	3

USAir %      40.0%

(1) See TW-R-203

Note: Three of four USAir flights depart  
at the same time as Delta flights.  
The fourth is a 2115 departure.



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NEARLY 90 PERCENT OF THE PASSENGERS USAIR  
CLAIMS FOR ITS TORONTO - PITTSBURGH CATCHMENT AREA  
ALREADY RECEIVE NONSTOP SERVICE AND/OR  
USAIR SERVICE VIA ANOTHER GATEWAY  
(Rebutal to Exhibit US-106)

	Number of Cities	Total Passengers 12 Months Ended June, 1994	% of Total
Total	95	3,512,130	
Nonstop Service to Toronto			
By USAir	7	461,485	13.1%
By Other Carriers	19	2,212,940	63.0%
Total	26	2,674,425	76.1%
Service via Another USAir Hub			
Nonstop	7	461,485	13.1%
Other	38	1,184,580	33.7%
Total	44	1,646,065	46.9%
USAir Markets with Existing USAir Service and/or Nonstop Service (1)	55	3,075,085	87.6%

(1) Eight Toronto city-pairs are both served via another USAir hub and nonstop by another carrier. This duplication has been eliminated.

Source: Exhibit TW-R-207



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Exhibit TW-R-206  
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NEARLY THREE-FOURTHS OF USAIR'S FORECAST  
PITTSBURGH - TORONTO PASSENGERS  
ALREADY RECEIVE NONSTOP SERVICE AND/OR  
USAIR SERVICE VIA ANOTHER GATEWAY  
(Rebutal to Exhibit US-106)

	Number of Cities	Online Passengers 12 Months Ended March 1996	% of Total
Total	95	151,923	
Nonstop Service to Toronto			
By USAir	7	11,497	7.6%
By Other Carriers	19	67,016	44.1%
Total	26	78,513	51.7%
Service via Another USAir Hub			
Nonstop	7	11,497	7.6%
Other	37	64,862	42.7%
Total	44	76,359	50.3%
USAir Markets with Existing USAir Service and/or Nonstop Service (1)	55	110,716	72.9%

(1) Eight Toronto city-pairs are both served via another USAir hub and nonstop by another carrier. This duplication has been eliminated.

Source: Exhibit TW-R-208



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Exhibit TW-R-207  
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INDUSTRY O&D PASSENGERS IN  
PITTSBURGH - TORONTO MARKETS  
12 MONTHS ENDED JUNE 1994  
(Rebuttal to Exhibit US-106)

	Total (1)	Nonstop USAir Service (2)	Markets Other Carriers (2)	Markets Served via Other USAir Hubs (3)	Nonstop Or Served Via Other USAir Hubs
Akron	520				
Albany	2,070		2,070	2,070	2,070
Albuquerque	8,390				
Allentown	3,270				
Ashland	310				
Atlanta	90,440		90,440	90,440	90,440
Austin	11,130				
Baltimore	19,580	19,580			19,580
Binghamton	90				
Birmingham	4,510			4,510	4,510
Boston	213,410	213,410			213,410
Burlington	1,310			1,310	1,310
Charleston, WVA	540			540	540
Charlottesville	1,060			1,060	1,060
Charlotte	19,900			19,900	19,900
Chicago	325,130		325,130		325,130
Cincinnati	8,340		8,340		8,340
Clarksburg	320				
Cleveland	52,910	52,910			52,910
Columbus	11,410			11,410	11,410
Cumberland	150				
Dallas/Ft. Worth	108,920		108,920		108,920
Dayton	3,390	3,390			3,390
Denver	41,960				
Detroit	81,870		81,870		81,870
Elmira	30				
Evansville	1,900			1,900	1,900
Flint	11,330		11,330		11,330
Ft. Lauderdale	34,950		34,950	34,950	34,950
Ft. Myers	15,100			15,100	15,100
Ft. Wayne	3,690				
Greenbrier	60				
Greensboro	8,330			8,330	8,330
Hagerstown	340			340	340
Harrisburg	4,710			4,710	4,710
Hartford	24,040		24,040	24,040	24,040
Houston	22,530		22,530	22,530	22,530
Indianapolis	15,520	15,520			15,520
Islip	990			990	990
Jacksonville	9,190			9,190	9,190
Johnstown	50			50	50



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INDUSTRY O&D PASSENGERS IN  
PITTSBURGH - TORONTO MARKETS  
12 MONTHS ENDED JUNE 1994  
(Rebuttal to Exhibit US-106)

	Total (1)	Nonstop USAir Service (2)	Markets Other Carriers (2)	Markets Served via Other USAir Hubs (3)	Nonstop Or Served Via oTHER USAir Hubs
Kansas City	21,180				
Knoxville	4,440				
Lancaster	860			860	860
Lansing	1,570				
Las Vegas	32,500				
Lexington	2,120				
Los Angeles	242,650		242,650		242,650
Louisville	7,230				
Lynchburg	440			440	440
Manchester	1,690			1,690	1,690
Memphis	11,470				
Miami	208,180		208,180	208,180	208,180
Milwaukee	25,760		25,760		25,760
Minneapolis	53,220				
Morgantown	160				
Nashville (4)	45,340				
New Orleans	30,250			30,250	30,250
New York	752,110		752,110	752,110	752,110
Newburgh	340			340	340
Newport News	770			770	770
Norfolk	5,240			5,240	5,240
Oil City	30				
Orlando	67,810		67,810	67,810	67,810
Parkersburg	230				
Philadelphia	111,630	111,630			111,630
Phoenix	56,890				
Pittsburgh	31,120		31,120		31,120
Portland, ME	4,720			4,720	4,720
Providence	2,330			2,330	2,330
Raleigh/Durham	30,440			30,440	30,440
Reading	810			810	810
Richmond	7,230			7,230	7,230
Roanoke	1,770				1,770
Saginaw	2,090				
San Antonio	12,080				
San Diego	34,520				
San Francisco	175,690		175,690		175,690
San Juan	15,090			15,090	15,090
Santa Ana	13,300				
Sarasota	9,040			9,040	9,040
Scranton	1,610			1,610	1,610
Seattle	29,480				
South Bend	5,380				
State College	370				



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INDUSTRY O&D PASSENGERS IN  
PITTSBURGH - TORONTO MARKETS  
12 MONTHS ENDED JUNE 1994  
(Rebuttal to Exhibit US-106)

	Total (1)	Nonstop Markets USAir Service (2)	Other Carriers (2)	Markets Served via Other USAir Hubs (3)	Nonstop Or Served Via Other USAir Hubs
St. Louis	28,570				
Tampa	186,290			186,290	186,290
Toledo	710				0
Washington	45,045	45,045		45,045	45,045
West Palm Beach	21,060			21,060	21,060
White Plains	820			820	820
Williamsport	520			520	520
Youngstown	210				
Total	3,508,095	461,485	2,212,940	1,646,065	3,075,085
% of Total		13.2%	63.1%	46.9%	87.7%

(1) From Exhibit US-301

(2) Source: OAG. Includes newly authorized routes and assumes USAir Washington - Toronto route.

(3) See TW-R-214

(4) Nonstop service to be discontinued June 15

(5) Air Canada has announced service to National Airport effective June 19. USAir has applied for an exemption to match.



USAIR'S FORECAST PITTSBURGH - TORONTO PASSENGERS  
(Rebuttal to Exhibit US-301)

	Total 12 Mos Ended March 1996 (1)	Nonstop USAir Service (2)	Markets Other Carriers (2)	Markets Served via Other USAir Hubs (3)	Nonstop Or Served Via Other USAir Hubs
Akron	386				
Albany	134		134	134	134
Albuquerque	988				
Allentown	914			914	914
Altoona	124				
Ashland	225				
Atlanta	934		934	934	934
Austin	867				
Baltimore	1,032	1,032		1,032	1,032
Binghamton	69				
Birmingham	578			578	578
Boston	1,703	1,703		1,703	1,703
Burlington	394			394	394
Charleston, WVA	356				356
Charlottesville	432			432	432
Charlotte	3,208			3,208	3,208
Chicago	1,656		1,656		1,656
Cincinnati	456		456		456
Clarksburg	274				
Cleveland	2,969	2,969		2,969	2,969
Columbus	1,930			1,930	1,930
Cumberland	155				
Dallas/Ft. Worth	2,074		2,074		2,074
Dayton	501	501		501	501
Denver	2,867				
Detroit	987		987		987
Elmira	31				
Evansville	564			564	564
Flint	1,282		1,282		1,282
Ft. Lauderdale	3,309		3,309	3,309	3,309
Ft. Myers	1,817			1,817	1,817
Ft. Wayne	833				
Greenbrier	60				
Greensboro	878			878	878
Hagerstown	225			225	225
Harrisburg	1,557			1,557	1,557
Hartford	2,188		2,188	2,188	2,188
Houston	566		566		566
Indianapolis	1,584	1,584		1,584	1,584
Islip	285			285	285
Jacksonville	980			980	980
Johnstown	52				
Kalamazoo	838				
Kansas City	2,119				



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USAIR'S FORECAST PITTSBURGH - TORONTO PASSENGERS  
(Rebuttal to Exhibit US-301)

	Total 12 Mos Ended March 1996 (1)	Nonstop USAir Service (2)	Markets Other Carriers (2)	Markets Served via Other USAir Hubs (3)	Nonstop Or Served Via Other USAir Hubs
Knoxville	723				
Lancaster	165			165	165
Lansing	406				
Las Vegas	1,656				
Lexington	788				
Los Angeles	4,060		4,060		4,060
Louisville	1,735				
Manchester	658			658	658
Memphis	776				
Miami	2,706		2,706	2,706	2,706
Milwaukee	3,206		3,206		3,206
Minneapolis	4,106				
Morgantown	148				
Nashville (4)	1,606				1,606
New Orleans	3,000			3,000	3,000
New York	4,844		4,844	4,844	4,844
Newburgh	246			246	246
Newport News	252			252	252
Norfolk	526			526	526
Oil City	31				
Orlando	8,156		8,156	8,156	8,156
Parkersburg	238				
Philadelphia	2,635	2,635		2,635	2,635
Phoenix	5,296				
Pittsburgh	15,559		15,559		15,559
Portland, ME	868			868	868
Providence	257			257	257
Raleigh/Durham	2,036			2,036	2,036
Reading	173			173	173
Richmond	859			859	859
Roanoke	528				528
Saginaw	309				
San Antonio	432				
San Diego	4,675				
San Francisco	2,021		2,021		2,021
San Juan	1,468			1,468	1,468
Santa Ana	1,414				
Sarasota	1,219			1,219	1,219
Scranton	670			670	670
Seattle	3,374				
South Bend	1,155				
State College	147				
St. Louis	3,112				
Tampa	12,878		12,878	12,878	12,878



USAIR'S FORECAST PITTSBURGH - TORONTO PASSENGERS  
(Rebuttal to Exhibit US-301)

	Total 12 Mos Ended March 1996 (1)	Nonstop USAir Service (2)	Markets Other Carriers (2)	Markets Served via Other USAir Hubs (3)	Nonstop Or Served Via Other USAir Hubs
Toledo	333				
Washington (5)	1,073	1,073		1,073	1,073
West Palm Beach	3,120			3,120	3,120
White Plains	154			154	154
Williamsport	280			280	280
Youngstown	121				
Total Online	151,923	11,497	67,016	76,359	110,716
% of Total		7.6%	44.1%	50.3%	72.9%
Interline	6,077				
Total	158,000				

- (1) From US-301
- (2) Source: OAG. Includes newly authorized routes and assumes USAir Washington - Toronto route.
- (3) See TW-R-214
- (4) Nonstop service to be discontinued June 15
- (5) Air Canada has announced service to National Airport effective June 19. USAir has applied for an exemption to match.



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**USAIR HAS INFLATED ITS CLAIMED CONNECTING  
OPPORTUNITIES BY COUNTING CONNECTIONS  
WITH FLIGHTS IN DIFFERENT CONNECTING BANKS  
(Rebuttal to Exhibits US-200, US-204)**

	Connecting Flights			% in Different Bank
	Same Bank	Different Bank	Total	
Arr from YYZ				
0830	64	16	80	20%
1915	57	38	95	40%
Dep to YYZ				
1600	45	37	82	45%
2115	59	38	97	39%
Total	225	129	354	36%

See following pages for detail

Source: US-204



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USAIR HAS INFLATED ITS CLAIMED CONNECTING  
OPPORTUNITIES BY COUNTING CONNECTIONS  
WITH FLIGHTS IN DIFFERENT CONNECTING BANKS  
(Rebuttal to Exhibits US-200, US-204)

Afternoon Northbound to Toronto

Dept Time: 1600

Arrivals in Same Bank (45)

FRA	1445
TOL	1447
IAH	1450
CVG	1502
MKE	1504
AZO	1505
SCE	1505
SAN	1508
SDF	1509
FWA	1510
HGR	1510
PHX	1510
BNA	1510
MCI	1510
SEA	1511
LAX	1512
LEX	1513
MCO	1513
GRR	1514
LYH	1515
STL	1515
LWB	1515
SNA	1515
JST	1515
AOO	1515
DAY	1516
ERI	1516
IND	1520
CLE	1520
CAK	1520
PBI	1522
MSP	1522
TYS	1523
SBN	1524
SFO	1524
EVV	1524
FNT	1524
MBS	1525
CMH	1526
LAN	1526
DFW	1527
MSY	1529
CRW	1530
HTS	1530

Arrivals in Prior Bank (23)

BDL	1409
BFD	1405
BOS	1401
BTW	1408
CBE	1350
CKB	1400
CLT	1337
DCA	1359
DUJ	1400
EWR	1408
IPT	1350
ISP	1404
JHW	1405
LGA	1413
MDT	1345
MGW	1350
MHT	1415
PKB	1405
RDG	1355
ROA	1355
SWF	1400
YNG	1400



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USAIR HAS INFLATED ITS CLAIMED CONNECTING  
OPPORTUNITIES BY COUNTING CONNECTIONS  
WITH FLIGHTS IN DIFFERENT CONNECTING BANKS  
(Rebuttal to Exhibits US-200, US-204)

Evening Northbound to Toronto

Dept Time: 2115

Arrivals in Same Bank (59)		Arrivals in Prior Bank (38)	
LAS	1957	AVP	1847
MEX	2000	MIA	1859
JST	2010	LNS	1859
FNT	2012	ROC	1900
BNA	2015	PKB	1905
MCO	2016	CBE	1905
DFW	2017	RDU	1905
LAN	2020	ABE	1905
SBN	2020	SRQ	1907
PHL	2020	ELM	1910
CLT	2020	MDT	1910
DEN	2022	MGW	1910
CVG	2022	DUJ	1910
BWI	2022	CAK	1910
PHX	2025	CKB	1910
MBS	2025	PBI	1910
MCI	2025	BDL	1911
CHO	2025	BUF	1914
STL	2025	JFK	1915
IAH	2025	BFD	1915
IPT	2025	HPN	1916
FWA	2026	RIC	1919
TOL	2027	ERI	1920
ATL	2027	ALB	1920
LEX	2027	HGR	1920
RSW	2028	AUS	1921
BHM	2028	CRW	1922
EVV	2029	PVD	1924
ROA	2030	ISP	1924
RDG	2030	UCA	1925
LGA	2030	SWF	1925
AZO	2031	HTS	1926
FLL	2031	SYR	1928
SNA	2031	ORF	1930
SAN	2031	GSO	1930
SEA	2032	BGM	1930
JAX	2032	AOO	1950
ABQ	2032		
SFO	2033		
SDF	2033		
LYH	2035		
BOS	2036		
DAY	2036		
CLE	2037		
TYS	2038		
CMH	2038		
GRR	2039		
EWR	2040		
IND	2040		
TPA	2041		
MDW	2043		
MSY	2044		
MSP	2044		
DCA	2044		
ORD	2044		
MKE	2045		
DTW	2045		



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USAIR HAS INFLATED ITS CLAIMED CONNECTING  
OPPORTUNITIES BY COUNTING CONNECTIONS  
WITH FLIGHTS IN DIFFERENT CONNECTING BANKS  
(Rebuttal to Exhibits US-200, US-204)

Morning Southbound from Toronto

Arrival Time: 0830

Dept from Same Bank (64)	Dept from Next Bank (16)
ERI	930
HTS	930
CRW	930
DAY	930
IND	930
MKE	930
MSP	930
MDW	930
MIA	930
CBE	935
DTW	935
CAK	935
JHW	935
TYS	935
SDF	935
BFD	935
PBI	935
SNA	940
JST	940
BNA	940
LYH	940
LEX	940
MPS	940
SFO	940
AZO	940
MGW	945
SEA	945
MCI	945
AUS	945
SBN	945
PKB	945
ART	945
GRR	945
FNT	945
MEX	950
LAN	950
CLE	950
YXU	950
TPA	950
MCO	950
YHM	950
FLL	950
YNG	950
PHX	955
SCE	955
SAN	955
TOL	955
DFW	955
LBE	955
ORD	955
CKB	955
FWA	1000
IAH	1000
FKL	1000
CVG	1000
DEN	1000
LAX	1000
MSY	1005
CMH	1005
MEM	1005
LAS	1015
STL	1020



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USAIR HAS INFLATED ITS CLAIMED CONNECTING  
OPPORTUNITIES BY COUNTING CONNECTIONS  
WITH FLIGHTS IN DIFFERENT CONNECTING BANKS  
(Rebuttal to Exhibits US-200, US-204)

Evening Southbound from Toronto

Arrival Time: 1915

Dept from Same Bank (57)		Dept from Next Bank (38)	
DTW	2000	PHL	2100
LAN	2000	MHT	2115
SRQ	2000	CRW	2115
SAN	2000	ISP	2115
MSY	2000	ELM	2115
LGA	2000	BGM	2115
FNT	2000	ROC	2120
PHX	2000	MDT	2120
SDF	2005	ERI	2120
RSW	2005	GSO	2120
CLE	2005	LNS	2120
MIA	2005	SWF	2125
YNG	2005	RDU	2125
LBE	2005	RIC	2125
TOL	2005	BDL	2125
PKB	2005	CLT	2125
STL	2005	UCA	2130
GRR	2010	ITH	2130
LEX	2010	PWM	2130
SCE	2010	BFD	2130
CAK	2010	EWR	2130
JST	2010	HPN	2130
CHO	2010	BOS	2135
LAX	2010	BUF	2135
LAS	2010	IAD	2135
MDW	2010	HGR	2135
ATL	2010	RDG	2140
CMH	2015	ABE	2140
AVP	2015	BTW	2140
CVG	2015	ORF	2140
LYH	2015	FKL	2140
IPT	2015	BWI	2140
FLL	2015	ALB	2145
MSP	2015	PVD	2145
TPA	2015	SYR	2145
DAY	2015	HTS	2150
TRI	2018	CBE	2205
MCO	2020		
DFW	2020		
DEN	2020		
MCI	2020		
AOO	2020		
PBI	2020		
ROA	2020		
ORD	2020		
JHW	2020		
DUJ	2020		
SBN	2025		
DCA	2025		
AZO	2025		
BNA	2025		
MKE	2025		
IND	2030		
SEA	2030		



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**ONE-THIRD OF USAIR'S CLAIMED TORONTO - PITTSBURGH  
CONNECTING OPPORTUNITIES REQUIRE CONNECTING TIMES  
IN EXCESS OF ONE HOUR 45 MINUTES  
(Rebuttal to Exhibit US-200, US-204)**

	Dep 1600	Dep 2115	Arr 0830	Arr 1915	Total
<b>Connecting Times</b>					
:30 or less	2	2	0	0	4
:31 - :45	22	28	0	8	58
:46 - 1:00	18	25	7	28	78
1:01 - 1:15	3	3	27	19	52
1:16 - 1:30	0	2	25	0	27
1:31 - 1:45	1	3	4	1	9
1:46 - 2:00	14	15	1	6	36
More than 2:00	8	19	16	33	76
<b>Total</b>	<b>68</b>	<b>97</b>	<b>80</b>	<b>95</b>	<b>340</b>
<b>% of Total</b>					
:30 or less	3%	2%	0%	0%	1%
:31 - :45	32%	29%	0%	8%	17%
:46 - 1:00	26%	26%	9%	29%	23%
1:01 - 1:15	4%	3%	34%	20%	15%
1:16 - 1:30	0%	2%	31%	0%	8%
1:31 - 1:45	1%	3%	5%	1%	3%
1:46 - 2:00	21%	15%	1%	6%	11%
More than 2:00	12%	20%	20%	35%	22%

Source: Exhibit US-204



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OF THE 94 CITIES BEYOND PITTSBURGH FOR WHICH  
USAIR CLAIMS SINGLE CARRIER BENEFITS,  
21 HAVE NO EFFECTIVE SERVICE VIA PITTSBURGH AND  
ANOTHER 19 HAVE EFFECTIVE SERVICE IN ONE DIRECTION ONLY  
(Rebuttal to Exhibit US-200)

Summary

	Number Of Cities	% of Total
No Effective Connections	21	22%
One one-way flight only	14	15%
Two flights, but no round trip service	5	5%
Subtotal	40	43%
Two round trips	27	29%
Other	27	29%
Total	94	

See other pages for details



OF THE 94 CITIES BEYOND PITTSBURGH FOR WHICH  
USAIR CLAIMS SINGLE CARRIER BENEFITS,  
21 HAVE NO EFFECTIVE SERVICE VIA PITTSBURGH AND  
ANOTHER 19 HAVE EFFECTIVE SERVICE IN ONE DIRECTION ONLY  
(Rebuttal to Exhibit US-200)

USAir Toronto Connections at Pittsburgh

	Connecting Time				Effective Connections (1)			
	Dep 1600N	Dep 2115N	Arr 0830S	Arr 1915S	No Service	1 One-Way Flight	One Way Only	Two R/T
Akron	:40	2:05	1:05	:55				
Albany		1:55		2:30	X			
Albuquerque		:43				X		
Allentown		2:10		2:25	X			
Altoona	:45	1:25	2:15	1:05				
Ashland	:30	1:49	1:00	2:35				
Atlanta		:48		:55				
Austin		1:54	1:15					
Baltimore		:53	2:15	2:25		X		
Binghamton		1:45			X			
Birmingham		:47		2:00		X		
Boston	1:59	:39	2:15	2:20		X		
Burlington	1:52		2:19	2:25	X			
Charleston, WVA	:30	1:53	1:00	2:00				
Charlottesville	:50	:50	1:25	:55				X
Charlotte	2:23	:55		2:10		X		
Chicago		:31		1:05				
Cincinnati	:58	:53	1:30	1:00				X
Clarksburg	2:00	2:05	1:25			X		
Cleveland	:40	:38	1:20	:50				X
Columbus	:34	:37	1:35	1:00				X
Cumberland	2:10	2:10	1:05	2:50		X		
Dallas/Ft. Worth	:33	:58	1:25	1:05				X
Dayton	:44	:39	1:00	1:00				X
Denver		:53	1:30	1:05				
Detroit		:30	1:05	:45				
Elmira		2:05		2:00	X			
Evansville	:36	:46					X	
Flint	:36	:36	1:15	:45				X
Ft. Lauderdale		:44	1:20	1:00				
Ft. Myers		:47		:50				
Ft. Wayne	:50	:49	1:30	1:10				X
Greenbrier	:45					X		
Greensboro		1:45		2:05	X			
Hagerstown	:50	1:55	2:25	2:20		X		
Harrisburg	2:15	2:05	2:50	2:05	X			
Hartford	1:51	2:44	2:15	2:10	X			
Houston	1:10	:50	1:30					
Indianapolis	:40	:35	1:00	1:15				X
Islip	1:56	1:51		2:00	X			
Jacksonville		:43				X		



OF THE 94 CITIES BEYOND PITTSBURGH FOR WHICH  
USAIR CLAIMS SINGLE CARRIER BENEFITS,  
21 HAVE NO EFFECTIVE SERVICE VIA PITTSBURGH AND  
ANOTHER 19 HAVE EFFECTIVE SERVICE IN ONE DIRECTION ONLY  
(Rebuttal to Exhibit US-200)

USAir Toronto Connections at Pittsburgh

	Connecting Time				Effective Connections (1)			
	Dep 1600N	Dep 2115N	Arr 0830S	Arr 1915S	No Service	1 One-Way Flight	One Way Only	Two R/T
Johnstown	:45	1:05	1:10	:55				X
Kalamazoo	:55	:44	1:10	1:10				X
Kansas City	:50	:50	1:15	1:05				X
Knoxville	:37		1:05					
Lansing	:34	:55	1:20	:45				X
Las Vegas		1:18	1:45	:55				
Lexington	:47	:48	1:10	:55				X
Los Angeles	:48	:55	1:30	:55				X
Louisville	:51	:42	1:05	:50				X
Lynchburg	:45	:40	1:10	1:00				X
Manchester	1:45		2:10	2:00	X			
Memphis			1:35		X			
Miami		2:16	1:10	:50			X	
Milwaukee	:56	:30	1:00	1:10				X
Minneapolis	:38	:31	1:00	1:00				X
Morgantown	2:10	2:05	1:15	:50			X	
Nashville	:50	1:00	1:10	1:10				X
New Orleans	:38	:31	1:35	:45				
New York	1:47	:45	2:15	:45				
Newburgh	2:00		2:25	2:10	X			
Newport News				2:20	X			
Norfolk		1:45		2:25	X			
Oil City			1:30	2:25		X		
Orlando	:47	:59	1:20	1:05				X
Parkersburg	1:55	2:10	1:15	:50			X	
Philadelphia		:55	2:30	1:45		X		
Phoenix	:50	:50	1:25	:45				X
Pittsburgh								
Portland, ME				2:15	X			
Providence		1:51		2:30	X			
Raleigh/Durham		2:10		2:10	X			
Reading	2:05	:45	2:20	2:25		X		
Richmond		1:56		2:10	X			
Roanoke	2:05	:45	2:30	1:05				
Saginaw	:35	:50	1:10	2:05				X
San Antonio					X			
San Diego	:52	:44	1:25	:45				X
San Francisco	:36	:42	1:10					
San Juan					X			



OF THE 94 CITIES BEYOND PITTSBURGH FOR WHICH  
USAIR CLAIMS SINGLE CARRIER BENEFITS,  
21 HAVE NO EFFECTIVE SERVICE VIA PITTSBURGH AND  
ANOTHER 19 HAVE EFFECTIVE SERVICE IN ONE DIRECTION ONLY  
(Rebuttal to Exhibit US-200)

USAir Toronto Connections at Pittsburgh

	Connecting Time				Effective Connections (1)			
	Dep 1600N	Dep 2115N	Arr 0830S	Arr 1915S	No Service	1 One-Way Flight	One Way Only	Two R/T
Santa Ana	:45	:44	1:10					
Sarasota		2:08		:45		X		
Scranton		2:28		2:00	X			
Seattle	:49	:43	1:15	1:15				X
South Bend	:36	:55	1:15	1:10				X
State College	:55		1:25	:55				
St. Louis	:45	:50	1:50	:50				
Tampa		:34	1:20	1:00				
Toledo	1:13	:48	1:25	:50				X
Washington	2:01	:31	2:31	1:10				
West Palm Beach	:38	2:05	1:05	1:05				
White Plains		1:59		2:15	X			
Williamsport	2:10	:50	2:20	1:00				
Youngstown	2:00		1:20	:50			X	
No. of Cities					21	14	5	27

(1) Connecting time of 1:30 or less. Cities not categorized have either  
one round trip or three one-way flights

Sources: US-204, US-301



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MORE THAN 90 PERCENT OF THE CITIES TWA WILL  
SERVE VIA ST. LOUIS WILL RECEIVE DAILY ROUND TRIP  
SERVICE TO TORONTO; MORE THAN 60 PERCENT WILL RECEIVE  
CONVENIENT CONNECTIONS TO EVERY TORONTO FLIGHT  
(Rebuttal to Exhibit US-200)

Summary

	Number of Cities	% of Total
Total	52	
Two Round Trips	32	62%
One Round Trip	16	31%
One Way Only	1	2%
No Convenient Connections (1)	3	6%

(1) 1:30 or less

Source: Pp 2 and 3 of this exhibit



MORE THAN 90 PERCENT OF THE CITIES TWA WILL  
SERVE VIA ST. LOUIS WILL RECEIVE DAILY ROUND TRIP  
SERVICE TO TORONTO; MORE THAN 60 PERCENT WILL RECEIVE  
CONVENIENT CONNECTIONS TO EVERY TORONTO FLIGHT  
(Rebuttal to Exhibit US-200)

TWA Connections at St. Louis

	Dep 1330	Connecting Time		Arr 1815	Effective Connections (1)			Two R/T
		Dep 1705	Arr 0825		No Service	1 One-Way Flight	One Way Only	
Jet Thru Service/Connections								
Albuquerque	:43	:59	1:03	:41				X
Austin		:55	1:05	:43				
Cedar Rapids	1:00	1:10	1:30	:35				X
Colorado Springs	:56			:44				
Dallas/Ft. Worth	:43	:39		:35				
Denver		1:07	:41	:36				
Des Moines	1:02	:53	1:06	:40				
Houston	1:03	:30	:40	:37				X
Kansas City	:59	:42	:50	:33				X
Las Vegas	:57	:39	:41	:50				X
Lincoln	:49	:58	:54	:45				X
Little Rock	:56	1:00	:49	:30				X
Los Angeles	1:05	1:24	:51	:35				X
Louisville			2:15 (2)	1:55 (2)	X			
Moline	:42	:55	:41	:46				X
Nashville	2:25 (2)			1:53	X			
New Orleans	:56	:37	:40					
Oklahoma City	:38	:55	:41	:45				X
Omaha	1:01	:55	:41	:45				X
Ontario	:48		:53	:33				
Orange County	:52	1:03	1:06	:44				X
Phoenix	:36 (3)	:37	:51 (3)	:50				X
Portland	:48		:55					
Sacramento	:40		1:00	:45				
Salt Lake City	:45	:46	:50	:56				X
San Antonio	:56	1:07	:58	:33				X
San Diego	:50	1:05 (3)	1:01	:35 (3)				X
San Francisco	:40	1:08	:50	:50				X
San Jose	:37		1:00	:50				
Seattle	:46	:45	:48	:50				X
Shreveport	:40		:40	:45				
Sioux Falls		:52		:50				
Springfield, MO	:55	:47	1:05	:42				X
Tulsa	:47	1:03	:46	:30				X
Wichita	:46	:53	:51	:39				X



MORE THAN 90 PERCENT OF THE CITIES TWA WILL  
SERVE VIA ST. LOUIS WILL RECEIVE DAILY ROUND TRIP  
SERVICE TO TORONTO; MORE THAN 60 PERCENT WILL RECEIVE  
CONVENIENT CONNECTIONS TO EVERY TORONTO FLIGHT  
(Rebuttal to Exhibit US-200)

TWA Connections at St. Louis

	Dep 1330	Connecting Time Dep 1705	Arr 0825	Arr 1815	No Service	Effective Connections (1) 1 One-Way Flight	One Way Only	Two R/T
Trans World Express Connections								
Birmingham	1:51 (2)	2:26 (2)	2:13 (2)	:24		X		
Burlington	:58	1:10	:55	:29				X
Champagne	:58	1:10	:44	:40				X
Columbia	1:03	:55	:49	:29				X
Decatur	:31	1:06	:40	:24				X
Evansville	:31	1:06	:40	:24				X
Joplin	:43	:39	1:04	:40				X
Marion	2:27 (2)	1:12	:39	1:50				X
Memphis	:59	:44	1:03					
Paducah	1:57 (2)	1:33	:45	2:13 (2)				
Peoria	2:04 (2)	1:06	:56	:45				
Quincy	:58	1:34		:50				
Sioux City	:31	:53	:40	:29				X
Springfield, IL	1:03	1:00	:39	:24				X
Waterloo	:46	:38	1:00	1:03				X
Number of Cities					3	1	0	32

(1) Connecting time of 1:30 or less. Cities not categorized have either one round trip or three one-way flights

(2) Not shown in TW-152, which is limited to connections of 1:30 or less

(3) Through service

Sources: TW-152 and TWA schedule data



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**USAIR WILL SERVE ONLY 13 OF THE 32  
CITIES WEST OF THE MISSISSIPPI WHICH WILL  
RECEIVE TWA JET SERVICE TO TORONTO  
(Rebuttal to Exhibit US-200)**

	USAir Round Trip Connections
<b>TWA Nonstop</b>	
St. Louis	Yes
<b>TWA Thru/ Connecting Jets</b>	
Albuquerque	
Austin	Yes
Cedar Rapids	
Colorado Springs	
Dallas/Ft. Worth	Yes
Denver	Yes
Des Moines	
Houston	Yes
Kansas City	Yes
Las Vegas	Yes
Lincoln	
Little Rock	
Los Angeles	Yes
Oklahoma City	
Omaha	
Ontario	
Orange County	Yes
Phoenix	Yes
Portland	
Sacramento	
Salt Lake City	
San Antonio	
San Diego	Yes
San Francisco	Yes
San Jose	
Seattle	Yes
Shreveport	
Sioux Falls	
Springfield, MO	
Tulsa	
Wichita	

Sources: Exhibits TW-151, TW-152, US-204



**TRANS WORLD AIRLINES** PASSENGER SERVICE

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Exhibit TW-R-214  
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**Nonstop-to-Nonstop Connections via**

	Nonstop	PHL	BWI	BOS	ROC	DAY
Albany				X	X	
Allentown		X				
Atlanta		X	X			
Baltimore	X	X				
Birmingham		(1)				
Boston	X					
Burlington				X		
Charlottesville			X			
Charlotte		X	X			
Cleveland	X					
Columbus		X				
Dayton	X					
Evansville		X				
Ft. Lauderdale		X				
Ft. Myers		X	X			
Greensboro		X				
Hagerstown			X			
Harrisburg		X	X			
Hartford		X	X	X		
Indianapolis	X					X
Johnston		X	X	X		
Jacksonville		X	X			
Lancaster						
Manchester		X		X		
Miami		X	X			
New Orleans		X	X			
New York		X	X			
Newburgh		X	X			
Newport News		X	X			
Norfolk		X				
Orlando		X				
Philadelphia	X					
Portland, ME				X		
Providence		X	X			
Raleigh/Durham		X	X			
Reading		X				
Richmond		X				
San Juan		X				
Sarasota		X				
Scranton		X				
Tampa						
Washington		X	X			
West Palm Beach		X	X			
White Plains			X	X	X	
Williamsport		X				



#### USAIR SERVICE

(1) Nonstop via Charlotte

Note: Hubs shown are those where elapsed times do not vary significantly from times via PIT

Source: OAG SSIM tapes, May 1995



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Exhibit TW-R-301  
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**AWARD OF NEWARK - TORONTO AUTHORITY  
TO CONTINENTAL/AIR CANADA WOULD  
INCREASE ITS DOMINANCE OF THE  
NEW YORK/NEWARK - TORONTO MARKET  
(Rebuttal to Exhibit CO-100)**

	LGA	EWR	Total
<b>Scheduled Daily Round Trips As of April 3, 1995</b>			
Air Canada	8	6	14
American	7	0	7
Total	15	6	21
% Air Canada	53%	100%	67%

Source: Official Airline Guide



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CONTINENTAL HAS ARBITRARILY INFLATED  
NEWARK'S SHARE OF NEW YORK - TORONTO  
PASSENGERS BY MORE THAN 50 PERCENT  
(Rebuttal to Exhibit CO-301)

O&D Passengers, Year 1993

	Total	EWB	EWB % Of Total
Based on Actual Onflight O&D	741,670 (1)	169,101	22.8% (3)
Continental Allocation	741,670 (1)	259,585 ((2)	35.0%
Continental Overstatement %		90,484 53.5%	

(1) Source: PCIR2A

(2) From Exhibit CO-301

(2) See page 2



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Page 2 of 2

**CONTINENTAL HAS ARBITRARILY INFLATED  
NEWARK'S SHARE OF NEW YORK - TORONTO  
PASSENGERS BY MORE THAN 50 PERCENT  
(Rebuttal to Exhibit CO-301)**

**New York - Toronto  
Onflight O&D Passengers  
Year 1993**

		% of Total
Newark	194,486	22.8%
Kennedy	7,357	0.9%
LaGuardia	652,687	76.4%
Total	854,530	100.0%

Source: PCIR1D



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**CONTINENTAL OVERSTATES ITS NEWARK -  
TORONTO O&D TRAFFIC BY NEARLY 70 PERCENT  
(Rebuttal to Exhibit CO-301)**

Continental Forecast	59,964
Corrected Forecast	
Total O&D Passengers:	
Year 1993 (1)	169,101
Growth (2)	5.0%
Forecast	177,556
Continental Market Share (3)	20.0%
Continental Passengers	35,511
Continental Forecast Overstatement	24,453
Percent	68.9%

- (1) From TW-R-302. Excludes Continental adjustments for alleged under-reporting of O&D passengers, not made by any other applicant.
- (2) From CO-301. 5% growth in 2 1/4 years is consistent with historical growth rates.  
See page 2
- (3) From CO-301



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**CONTINENTAL OVERSTATES ITS NEWARK -  
TORONTO O&D TRAFFIC BY NEARLY 70 PERCENT  
(Rebuttal to Exhibit CO-301)**

**History of New York - Toronto Traffic**

	O&D Passengers	Change From Prior Year
1988	746,890	
1989	798,970	7.0%
1990	832,490	4.2%
1991	714,900	-14.1%
1992	737,090	3.1%
1993	741,670	0.6%
1994 (1)	752,110	1.4%

Growth from 1991 to  
12 months ended June 1994  
(30 months) 5.2%

**Continental Forecast**  
Growth from 1993 to  
12 months ended March 1996  
(27 months) 5.0%



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**NEARLY TWO-THIRDS OF CONTINENTAL'S  
FORECAST THRU/CONNECTING PASSENGER  
ARE IN MARKETS WHICH ALREADY  
HAVE NONSTOP SERVICE**

Online Passengers (1)	111,688
Less EWR	59,964
Online Thru/Connect	51,724
<b>Cities with Existing Nonstop Service</b>	
ATL	2,082
BDL	2,426
BWI	562
CLE	1,178
DAY	446
FLL	5,882
IAH	672
IND	483
MCO	10,733
MIA	2,514
PHL	1,238
TPA	4,766
WAS	1,062
Total	34,044
% of Thru/Connect	65.8%
(1) Total before "Additional Traffic" from CO-301	

Source: Official Airline Guide



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NORTHWEST HAS NOT FULLY UTILIZED ITS EXISTING  
MINNEAPOLIS/ST. PAUL - TORONTO AUTHORITY; IT  
OFFERS NO SINGLE PLANE SERVICE FROM TORONTO  
(Rebuttal to Exhibit NW-600)

Northwest Single Plane Service  
As of April 3, 1995

Flight Number	Departure Time
------------------	-------------------

From Minneapolis/St. Paul:

714	725
746	1010

From Toronto

No single plane service

Source: Official Airline Guide



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Exhibit TW-R-402  
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NORTHWEST SERVICE WITH 100 SEAT DC9S  
WOULD BE INEFFECTIVE USE OF  
LIMITED TORONTO FREQUENCIES

—  
IT WOULD ACCCOMMODATE ONLY 30 PERCENT OF  
THE MINNEAPOLIS/ST. PAUL - TORONTO MARKET  
(Rebuttal to Exhibit NW-600)

O&D Passengers  
12 Months Ended  
March 31, 1996

Total Market	60,319
Northwest Nonstop Passengers	18,096
Percent on Nonstop	30.0%

Source: NW-301



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Exhibit TW-R-403  
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**NORTHWEST SERVICE WITH 100 SEAT DC9S  
WOULD BE INEFFECTIVE USE OF  
LIMITED TORONTO FREQUENCIES**

**NORTHWEST WOULD USE ONE OF FOUR NEW  
FREQUENCIES TO PROVIDE ONE-STOP SERVICE  
THE 108th LARGEST U.S. - TORONTO MARKET  
(Rebuttal to Exhibit NW-600)**

**Boise, Idaho**

Rank based on 1993 traffic 108

**O&D Passengers:**

Annual 1,890

Per day each way 2.6

Source: NW-301



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Page 1 of 1

NORTHWEST SERVICE WITH 100 SEAT DC9  
WOULD BE INEFFECTIVE USE OF  
LIMITED TORONTO FREQUENCIES  
(Rebuttal to Exhibit NW-600)

NORTHWEST'S CAPACITY WOULD BE  
INADEQUATE FOR PEAK SEASON DEMAND

	Load Factor
April 1995	71.2%
May	77.6%
June	81.3%
July	78.7%
August	84.4%
September	83.5%
October	84.4%
November	64.2%
December	64.1%
January 1996	64.6%
February	68.1%
March	79.4%

Source: NW-305



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DETROIT IS A NORTHWEST HUB WHICH  
PERMITS NONCIRCUITOUS SERVICE BETWEEN  
TORONTO AND THE WESTERN UNITED STATES  
(Rebuttal to Exhibit NW-608)

	Circuitry	
	Via DTW	Via MSP
Phoenix	0.5%	4.2%
San Diego	0.6%	2.5%
Orange County	0.7%	2.0%
Los Angeles	0.8%	1.8%
Las Vegas	1.0%	1.8%
San Francisco	1.5%	0.4%
Denver	1.6%	3.3%
Seattle	3.9%	0.8%

Source: Great Circle Mileages



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**NEARLY HALF OF THE PASSENGERS NORTHWEST  
WOULD CARRY VIA MINNEAPOLIS/ST. PAUL  
ALREADY HAVE EXPEDITED SERVICE VIA DETROIT  
(Rebuttal to Exhibit NW-301)**

O&D Passengers  
12 Months Ended  
March 31, 1996

**Online Markets**

Total	104,831
Less Minneapolis/St. Paul	18,096

Total Thru/Connect	86,735
--------------------	--------

**Markets with Northwest Single Plane and/or  
Nonstop-to-Nonstop Connections via Detroit**

Chicago	3,212
Dallas/Ft. Worth	2,280
Denver	4,164
Des Moines	2,241
Detroit	1,565
Kansas City	2,044
Las Vegas	5,341
Los Angeles	2,646
Orange County	2,707
Phoenix	5,473
San Diego	1,986
San Francisco	1,868
Seattle	1,604
St. Louis	3,048

Total	40,179
-------	--------

Percent of Thru/Connect Passengers	46.3%
------------------------------------	-------

Sources: NW-301, Official Airline Guide



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NEARLY HALF OF THE MARKETS NORTHWEST  
PROPOSES TO SERVE GENERATED LESS  
THAN 1,000 ANNUAL PASSENGERS IN 1993  
(Rebuttal to Exhibit NW-200)

Number of City-Pairs:

Total 60

Less than 1,000 passengers in 1993 (1) 26

(1)	Aberdeen	La Crosse/Winona
	Bemidj	Mason City
	Billings	Minot
	Bismark	Missoula
	Bozeman	Pierre
	Brainerd	Rapid City
	Eau Claire	Rhineland
	Ft. Dodge	Saint Cloud
	Grand Forks	Sioux City
	Grand Rapids	Thief River Falls
	Great Falls	Waterloo
	Hancock	Watertown
	Hibbing	
	International Falls	

Source: NW-301



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**TWA'S ST. LOUIS - TORONTO SERVICE WOULD BENEFIT  
MORE THAN 46,000 LOCAL ST. LOUIS PASSENGERS;  
NORTHWEST EXPECTS ONLY 18,000 LOCAL PASSENGERS  
ON ITS NEW SERVICE  
(Rebuttal to Exhibit NW-600)**

O&D Passengers  
12 Months Ended  
March 31, 1996

**TWA:**

St. Louis - Toronto (1)	46,230
-------------------------	--------

**Northwest:**

Minneapolis/St. Paul - Toronto (2)	18,096
------------------------------------	--------

(1) Exhibit TW-301

(2) Exhibit NW-301



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Exhibit TW-R-409  
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**TWA'S ONE-STOP TORONTO SERVICE  
WOULD BENEFIT FOUR TIMES AS MANY  
PASSENGERS AS NORTHWEST'S PROPOSAL  
(Rebuttal to Exhibit NW-200)**

**Total Toronto  
O&D  
Passengers  
Year 1993**

**TWA:**

Phoenix	49,030
San Diego	32,030
Total	81,060

**Northwest:**

Salt Lake City	16,790
Boise	1,890
Total	18,680

Northwest Markets Percent of TWA Markets	23.0%
---	-------

Source: PCIR2A



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**TWA WILL PROVIDE MORE TOTAL CONNECTIONS  
AND MORE JET CONNECTIONS THAN NORTHWEST**  
(Rebuttal to Exhibit NW-203)

	Jet Connections	Commuter Connections	Total
<b>TWA</b>			
<b>From YYZ</b>			
Arr 0825	37	9	46
Arr 1705	34	11	45
<b>To YYZ</b>			
Dep 1620	30	13	43
Dep 1800	27	16	43
Total	128	49	177
<b>NORTHWEST</b>			
<b>From YYZ</b>			
Arr 0836	28	17	45
Arr 1856	31	14	45
<b>To YYZ</b>			
Dep 1300	28	17	45
Dep 1800	23	13	36
Total	110	61	171

Sources: Exhibits TW-152, NW-203



THE TORONTO MARKETS TWA WOULD SERVE  
GENERATED 95,000 MORE PASSENGERS IN 1993 THAN THE MARKETS  
NORTHWEST PROPOSES TO SERVE VIA MINNEAPOLIS/ST. PAUL  
(Rebuttal to Exhibit NW-600)

Total Toronto O&D Passengers

Markets Served By TWA But Not by Northwest		Markets Served by Northwest But Not by TWA	
Birmingham	4,700	Aberdeen	80
Burlington	390	Anchorage	9,280
Cedar Rapids	4,190	Appleton	4,030
Champagne	1,410	Bemidj	250
Colorado Springs	3,670	Billings	520
Columbia	120	Bismark	560
Decatur	290	Boise	1,890
Evansville	2,070	Bozeman	580
Fayetteville	1,100	Brainerd	120
Houston	29,070	Duluth/Superior	1,230
Joplin	430	Eau Claire	200
Little Rock	3,710	Fargo	1,320
Louisville	7,530	Fort Dodge	50
Marion	20	Grand Forks	540
Memphis	10,370	Grand Rapids, MN	80
Moline	3,030	Great Falls	170
Nashville	42,240	Hancock	160
New Orleans	27,560	Hibbing	120
Oklahoma City	3,860	International Falls	470
Paducah	330	LaCrosse/Winona	960
Peoria	1,920	Mason City	170
Quincy	170	Minot	400
San Antonio	12,650	Missoula	360
Shreveport	940	Pierre	30
Springfield, IL	930	Rapid City	600
Springfield, MO	1,220	Reno	5,290
Tulsa	5,320	Rhineland	280
Wichita	4,560	Rochester, MN	3,710
		Saint Cloud	0
		Spokane	3,280
		St. Louis (1)	28,520
		Thief River	10
		Tucson	13,110
		Watertown	70
Total	173,800	Total	78,440

(1) STL would be served nonstop by TWA. Total excluding STL is 49,920.

Note: Chicago and Detroit have been excluded from the cities served by Northwest. Although Northwest is forecasting Toronto traffic to those cities via MSP, service via MSP would not be meaningful.



BASED ON NORTHWEST'S OWN CIRCUITY CRITERIA (1),  
TWA WOULD PROVIDE NEW ONLINE SERVICE (2) TO  
NEARLY FIVE TIMES AS MANY PASSENGERS  
IN TOP MARKETS WEST OF THE MISSISSIPPI  
AS NORTHWEST'S SERVICE VIA MINNEAPOLIS/ST. PAUL  
(Rebuttal to Exhibit NW-608)

Overall Traffic Rank	City	YYZ O&D Passengers 1993	Routing % Longer than Nonstop		
			Northwest via Detroit	via MSP, Not DTW	TWA via St. Louis
15	Phoenix	49,030	0.5%		2.2%
19	Denver (3)	39,820	1.6%		
21	San Diego	32,030	0.6%		2.6%
22	Las Vegas	31,900	1.0%		4.3%
23	Seattle (3)	29,360	3.9%		
25	St. Louis	28,520			0.0%
35	Salt Lake City (3)	16,790		0.3%	
37	San Jose (3)	16,090	0.5%		
38	Orange County	14,550	0.7%		3.2%
39	Tucson	13,110			1.4%
40	Portland (3)	13,060		0.5%	
42	San Antonio	12,650			1.2%
Cities within 5% Circuity			7	2	7
O&D Passengers within 5% Circuity			261,810	29,850	141,480

- (1) Defined for this proceeding by Northwest as 5% circuity or less. This definition does not conform to commercial realities. In fact, TWA's St. Louis service area is much broader. See TW-152.
- (2) Excluding markets with nonstop Toronto service and cities Northwest already serves via Detroit. Source: NW-302
- (3) TWA offered direct connections. See TW-152.



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**DELTA CANNOT PROVIDE CONVENIENT SERVICE  
BETWEEN TORONTO AND POINTS WEST OF  
THE MISSISSIPPI VIA ATLANTA  
(Rebuttal to Exhibit DL-118)**

**Nonstop-to-Nonstop Mileage**

	TWA Via St. Louis	Delta Via Atlanta	Delta Circuity vs TWA	
			Miles	%
New Orleans	1,258	1,164	(94)	-7.5%
Houston	1,341	1,435	94	7.0%
Shreveport	1,130	1,291	161	14.2%
San Antonio	1,440	1,613	173	12.0%
Dallas/Ft. Worth	1,204	1,470	266	22.1%
Phoenix	1,916	2,326	410	21.4%
Albuquerque	1,588	2,008	420	26.4%
Los Angeles	2,246	2,685	439	19.5%
Las Vegas	2,026	2,486	460	22.7%
Salt Lake City	1,810	2,328	518	28.6%
Kansas City	892	1,432	540	60.5%

Source: Great Circle Mileages



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**DELTA PROVIDES TORONTO SERVICE TO ONLY  
12 CITIES WEST OF THE MISSISSIPPI;  
TWA WILL PROVIDE JET SERVICE TO 32 CITIES  
(Rebuttal to Exhibit US-200)**

**Delta  
Round Trip  
Connections**

**TWA Nonstop  
St. Louis**

**TWA Thru/  
Connecting Jets**

Albuquerque	
Austin	Yes
Cedar Rapids	
Colorado Springs	
Dallas/Ft. Worth	Yes
Denver	Yes
Des Moines	
Houston	Yes
Kansas City	Yes
Las Vegas	
Lincoln	
Little Rock	Yes
Los Angeles	Yes
Oklahoma City	
Omaha	
Ontario	
Orange County	
Phoenix	
Portland	
Sacramento	
Salt Lake City	Yes
San Antonio	Yes
San Diego	
San Francisco	
San Jose	
Seattle	
Shreveport	Yes
Sioux Falls	
Springfield, MO	
Tulsa	
Wichita	Yes

**No TWA Service  
Baton Rouge**

Yes



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**NEARLY THREE-FOURTHS OF DELTA'S CLAIMED  
ATLANTA CATCHMENT AREA PASSENGERS  
ARE IN MARKETS WITH NONSTOP SERVICE  
(Rebuttal to Exhibit DL-115)**

	<b>Total O&amp;D Passengers Year 1993</b>
<b>Catchment Area Total</b>	<b>867,250</b>
<b>Cities with Nonstop Toronto Service:</b>	
Atlanta	90,110
Ft. Lauderdale	40,740
Miami	217,660
Orlando	74,340
Tampa	206,400
<b>Total</b>	<b>629,250</b>
<b>% of Catchment Area Passengers</b>	<b>72.6%</b>

Source: Official Airline Guide

Source: DL-115



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THERE IS NONSTOP SERVICE  
BETWEEN ATLANTA AND TORONTO  
(Rebuttal to Exhibits DL108 - DL112)

Air Canada Schedule as of April 3

Flight  
Number    Departs

From Toronto

560	705
562	935
564	1515
568	1915

From Atlanta

561	700
563	1000
565	1215
567	1800

Source: Official Airline Guide



EXCLUDING CITIES WITH ALTERNATIVE NONSTOP SERVICE,  
TWA'S ST. LOUIS CATCHMENT AREA HAS  
TWO AND ONE HALF TIMES THE NUMBER OF PASSENGERS  
AS DELTA'S ATLANTA CATCHMENT AREA  
(Rebuttal to Exhibit DL-115)

	Total O&D Passengers Year 1993
Delta Catchment Area (1)	867,250
Excluding Cities with Nonstop Service (2)	195,760
<b>TWA Catchment Area (3)</b>	
St. Louis	28,520
Proposed One-Stop Markets	81,060
Jet Connecting Markets	919,390
Trans World Express Connections	25,820
Total	1,054,790
Cities with Nonstop Service to YYZ:	
Dallas/Ft. Worth	102,130
Houston	29,070
Los Angeles	247,580
San Francisco	171,040
Total	549,820
Catchment Area excluding Cities With Nonstop Service to YYZ	504,970
<b>TWA Catchment Area Percent Of Delta Catchment Area</b>	<b>258%</b>

(1) DL-115

(2) TW-R-503

(3) TW-301

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<u>Exhibit</u>	<u>Number Of Pages</u>	<u>Title</u>
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TW-R-100	10	Introduction to TWA's Rebuttal Exhibits
TW-R-101	3	TWA's St. Louis - Toronto Service Will Provide New Single Carrier Benefits to Markets with More than One Million Passengers, Half of Whom Have No Nonstop Service to Toronto
TW-R-102	1	TWA's St. Louis - Toronto Service Will Provide New Single Carrier Benefits to More than 105,000 Passengers, 93,000 of Whom Have No Nonstop Service to Toronto
TW-R-103	1	TWA's St. Louis - Toronto Service Will Benefit More Passengers than USAir, Northwest or Continental
TW-R-104	1	TWA's St. Louis - Toronto Service Will Benefit More Local Passengers than USAir or Continental
TW-R-105	1	There Is Little Difference in Benefits to Thru/Connecting Passengers Among TWA, Northwest and USAir
TW-R-106	1	TWA's Proposed Single Plane Markets Are the Most Underserved Markets at Issue in This Proceeding
TW-R-107	5	Replacement of USAir's Pittsburgh - Toronto Service by TWA's St. Louis - Toronto Service Would Benefit 46,000 St. Louis Passengers with Negligible Impact on USAir Passengers
<b>Rebuttal to USAir</b>		
TW-R-201	1	USAir Ranks Second in Total O&D Traffic at Toronto
TW-R-202	1	USAir Ranks Second Among Major US Carriers Serving Toronto

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